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Attorneys for Defendants  
Lawrence J. Mazzola; Lawrence Mazzola, Jr;  
William B. Fazande; Larry Lee; James R. Shugrue;  
Vohon J. Kazarian; Tom Irvine; Robert E. Buckley;  
Robert Buckley, Jr; Art Rud; Ron Fahy; Robert  
Nurisso; Frank Sullivan; U.A. Local 38 Pension  
Trust Fund; U.A. Local 38 Health & Welfare Trust  
Fund; U.A. Local 38 Apprentice & Journeyman  
Training Trust Fund; U.A. Local 38 Scholarship  
Trust Fund; U.A. Local 38 Vacation and Holiday  
Trust Fund; U.A. Local 38 Convalescent Trust Fund  
and Richard L. Milsner

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ELAINE L. CHAO, Secretary of Labor,  
United States Department of Labor,

Plaintiff,

v.

LAWRENCE J. MAZZOLA, et al.,

Defendants.

**Case No. C 04 4949 PJH**

**STIPULATED REQUEST FOR ORDER  
SHORTENING TIME ON MOTION TO  
COMPEL ; ORDER**

Pursuant to Civil L.R. 6-2, Defendants Lawrence J. Mazzola, Lawrence Mazzola, Jr.,  
William B. Fazande, Larry Lee, James R. Shugrue, Vohon J. Kazarian, Tom Irvine, Robert E.  
Buckley, Robert Buckley, Jr., Art Rud, Ron Fahy, Robert Nurisso, Frank Sullivan, U.A. Local 38  
Pension Trust Fund, U.A. Local 38 Health & Welfare Trust Fund, U.A. Local 38 Apprentice &  
Journeyman Training Trust Fund, U.A. Local 38 Scholarship Trust Fund, U.A. Local 38 Vacation  
and Holiday Trust Fund, U.A. Local 38 Convalescent Trust Fund, and Richard L. Milsner  
(collectively, "Defendants"), and Plaintiff Elaine Chao, Secretary of Labor, United States

Department of Labor ("DOL"), through their respective counsel, hereby request that the Court shorten the time for briefing and hearing Defendants' Motion to Compel Production of Documents and Deposition Testimony.

Pursuant to Civil L.R. 6-2, the reasons for the requested shortening of time are set forth with particularity in the accompanying Declaration of Katherine Ritchey in Support of Stipulated Request for Order Shortening Time.

The proposed briefing and hearing dates, as agreed to by the parties and subject to the Court's availability and approval, are as follows:

Defendants' opening brief due: July 21, 2006

Plaintiff's opposition brief due: July 28, 2006 by 10:00 a.m.

Defendants' reply brief due: August 2, 2006 by 10:00 a.m.

Hearing: August 9, 2006 at ~~10:30 a.m.~~ 10:00 a.m.

Counsel for the parties have further agreed that, should Defendants prevail on the motion to compel and further production of documents be ordered, the documents shall be produced within five business days of the Court's Order. If any parties are submitting materials under seal, chambers must receive sealed materials by the above dates and time.

Dated: July \_\_, 2006

JONES DAY

By: \_\_\_\_\_  
Katherine S. Ritchey

Attorneys for Defendants  
Lawrence J. Mazzola; Lawrence Mazzola, Jr;  
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Shugrue; Vohon J. Kazarian; Tom Irvine;  
Robert E. Buckley; Robert Buckley, Jr; Art  
Rud; Ron Fahy; Robert Nurisso; Frank  
Sullivan; U.A. Local 38 Pension Trust Fund;  
U.A. Local 38 Health & Welfare Trust Fund;  
U.A. Local 38 Apprentice & Journeyman  
Training Trust Fund; U.A. Local 38  
Scholarship Trust Fund; U.A. Local 38  
Vacation and Holiday Trust Fund; U.A. Local  
38 Convalescent Trust Fund and Richard L.  
Milsner

1 Dated: July\_\_\_\_, 2006

2  
3 By: \_\_\_\_\_  
Wayne Berry

4 Attorney for Plaintiff Elaine L. Chao,  
5 Secretary of Labor, United States  
6 Department of Labor.

7 **[PROPOSED] ORDER**

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

9  
10  
11 Dated: jULY 24, 2006

12  
13 UNITED STATES DISTRICT COURT

